

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

1. CELESTIAL CHURCH OF CHRIST
U.S.A DIOCESE

2. JOSEPH OLORUNNISOLA

SUIT NO: 17-cv-6012

3. AMOS ADEBISI ADEOYE

:

vs.

:

JURY TRIAL DEMANDED

:

1. ISAAC OWOLABI

2. OLASEHINDE SAMUEL SOWEMIMO

3. ABOSEDE SOWEMIMO

4. ALONGE DELE MICHAEL

:

CIVIL ACTION COMPLAINT

COMES NOW, Plaintiffs, by counsel, and complains of Defendants as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action under 28 U.S.C. § 1332(a)(1) because Plaintiffs and Defendants are citizens of different states and the amount in controversy exceeds \$ 100,000.00.
2. This Court has personal jurisdiction over the Defendants because the false and defamatory statements made by Defendants were published in the State of New York, and targeted the Plaintiffs, including the members of the 1st Plaintiff church with untrue defamatory statements.
3. This Court has venue under 28 U.S.C. § 1391(a)(2) because all or a substantial portion of the events that gave rise to Plaintiff's claims touched on and affected the Plaintiffs and the

members of the first Plaintiff church in the State of New York, including the publication or republication of the defamatory and untrue or false article(s) and the damage to Plaintiffs' reputation, standing and character in the case of the 3rd Plaintiff.

PARTIES

4. 1st Plaintiff is a not for profit spiritual, evangelical and religious organization, organized as a not for profit corporation, which has about 90 parishes (branches) in 25 states in the U.S.A and about 6,000 members, inclusive of New York State, where the 1st Plaintiff has 12 parishes (the most in any state) including but not limited to Celestial Church of Christ, New York Parish, 1380 Jefferson Avenue, Brooklyn, New York, 11237 and Celestial Church of Christ, Queens Parish, 310 Elton Street, Cypress Hill, New York 11208 to mention a few, with its office at 1380 Jefferson Avenue, Brooklyn, New York. 11237.
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5. 2nd Plaintiff, Joseph Olorunnisola, is the Spiritual Head of the Celestial Church of Christ, U.S.A Diocese, a Citizen of the United States and a resident of the State of New Jersey and with his address at 46 Weber Avenue, Trenton New Jersey 08638.
6. 3rd Plaintiff, Amos Adeoye is the Reverend in charge of Celestial Church of Christ, Comforter Parish, 7623-25 South Vermont Avenue, Los-Angeles California, 90044 and a resident of the State of California.
7. 1st Defendant Isaac Owolabi is, and at all times relevant hereto, a Nigerian Citizen who lives at 77 Idiroko road, Lagos, Nigeria, owner and managing director of Isaaco Media and design, publishers of celestialonline.com.
8. 2nd Defendant, Olasehinde Samuel Sowemimo is a Nigerian Citizen and a resident of the State of Texas, living at 505 Travis Ranch Trail, Arlington, TX 76002 Dallas, Texas.
9. 3rd Defendant, Abosede Sowemimo is a Nigerian Citizen and a resident of the State of Texas, living 505 Travis Ranch Trail, Arlington, TX 76002 Dallas, Texas.
10. 4th Defendant, Alonge Dele Michael is the publisher/editor-in-chief of celestial news online, an online magazine, a Nigerian citizen who lives at 155 Herbert Macaulay Street, Yaba, Lagos, Nigeria.

FACTUAL STATEMENTS

11. This case is about repeated acts of defamation, libel and libel per se committed by the defendants in several online publications and broadcasts.
12. On or about August 28th, 2017, the 2nd and 3rd Defendants caused to be published in the 1st Defendant's online magazine, celestialonline.com, and republished in the 4th Defendant's online magazine, celestialnewsonline.com, an article entitled "Who has Comforter Parish, California Shepherd, Adebisi Adeoye offended?" In the said article, the Defendants published several libelous statements against the Plaintiffs, when they wrote that;
"he was recently caught wanting to sleep with his daughter", (referring to the 3rd Plaintiff).
"Mrs. Adeoye was also said to have found some damaging sexual text messages that revealed that Amos Adeoye has been sleeping with Mrs. Bukola popularly known as Mama Solo. The Shepherd is well-known for his promiscuity and the elders in California have done nothing about it."
"a couple of years back, precisely in the year 2012, an anonymous lady accused Amos Adebisi Adeoye of wanting to kill her husband after Amos asked her to take a picture of her private part and also told her to feed her then boyfriend a charm" These libelous statements were made without any basis in fact and solely to disparage and embarrass the 3rd Plaintiff and his church (1st Plaintiff). The 1st Defendant alleged in a statement to the 2nd Plaintiff, that the material published in the said article was sent to him by the 2nd and 3rd Defendants. The article was also republished on celestialnewsonline.com. The 4th Defendant is the publisher/editor-in-chief of celestialnewsonline.com. A copy of the article is attached hereto as Exhibit "A".
13. The statements contained in the article were false in that the 3rd Plaintiff did none of the despicable things the Defendants in their said article claimed, and the same was intended to cause harm and ill thoughts of the Plaintiffs.

14. Defendants made many other false statements of facts in the article in order to cause Plaintiffs' harm.
15. The 2nd and 3rd Defendants have also made further false and derogatory statements concerning the Plaintiffs in videos posted on the 3rd Defendant's facebook blog.
16. Between 1st of March 2017 and 30th of September 2017, the 2nd and 3rd Defendants created a series of videos in Yoruba language (Nigerian) in which the 3rd Defendant made several false and disparaging remarks about the 1st Defendant and posted same on her facebook blog and the videos were viewed and reposted worldwide by over a hundred thousand people.
17. The videos have been further shared with other people (unknown to Plaintiffs) and will likely continue to be published in the future, and would cause people to think ill of Plaintiffs and hurt their reputation.
18. In two of the videos, the 3rd Defendant stated inter-alia
“ Most of the shepherds of Celestial Church in America have eaten burgers and are now full, and so are the Shepherds in UK. You will never see any of the Celestial Churches in America do a three day revival, or even do one every three months to be able to save and protect their members...None of them are strong in prayers...Once you have had sex with all the members, how is God going to reveal anything to you?”
“And for you Shepherd whose Harvest is tomorrow, please put "your anaconda" in a cage, you have 3 wives, feed them all and they will be satisfied...stop using your penis to chase all the church members around. We will continue to speak no matter what.”
19. These blog videos have been viewed by over a hundred thousand people and has lowered the estimation of the Plaintiffs in the eyes of the general public who understood its libelous meaning and that the videos referred to Plaintiffs and has caused harm to Plaintiffs reputation and status.

FIRST CAUSE OF ACTION – LIBEL

20. The allegations contained in paragraphs 1 – 19 above, are repeated as if fully rewritten herein.
21. The statements contained in the article and blog postings published by Defendants are false and untrue.
22. Defendants knew the statements to be false and untrue, and Defendants acted intentionally in causing the offensive items to be published.

23. Defendants were negligent, wanton, careless and/or acted recklessly knowing that the statements contained in the publication were false and untrue before publishing it.
24. As specified below, Plaintiffs were injured and damaged by the publishing of the article And blogpost (video).

SECOND CAUSE OF ACTION – LIBEL PER SE

The Plaintiff hereby repeats and re-alleges each and every allegation in paragraphs 1 through 19 as if fully set forth herein.

25. The 1st, 2nd, 3rd and 4th Defendants published or caused to be published defamatory statements about the Plaintiff.
26. These defamatory statements were untrue and defamatory in that they falsely reported the Plaintiff's Professional skills, ability and character, and the 1st, 2nd, 3rd, and 4th Defendants knew, or should have known that such statements were false.
27. The 1st, 2nd, 3rd and 4th Defendants published or caused the statements to be published with malice and with knowledge of their falsity and/or a reckless disregard for the truth or falsity of these statements.
27. These statements constitute Defamation and/or libel per se because they falsely impugn the 2nd and 3rd Plaintiff's Character, dependability, Professional fitness and ability and have caused the 2nd and 3rd Plaintiffs embarrassment, humiliation, ridicule and emotional injury.
28. As a result of the said defamation, the 2nd and 3rd Plaintiffs continues to suffer from humiliation, loss of standing in society, loss of employment, Professional disrepute, loss of self esteem, public disgrace, severe and extreme emotional distress.
29. As a result of the conduct of the 1st, 2nd, 3rd and 4th Defendants, the Plaintiffs are entitled to monetary and punitive damages
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THIRD CAUSE OF ACTION – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

30. The allegations contained in paragraphs 1 – 19, above, are repeated as if fullrewritten herein.

31. By the act of publishing the article, Defendants intended to cause harm to 3rd Plaintiff who suffered physical, mental, economic harm and emotional distress.

32. The Defendants intentionally caused the article and blog videos to be published with reckless disregard of the probability that doing so will cause emotional distress to the 3rd Plaintiff.

The actions of the Defendants caused 3rd Plaintiff to suffer mental anguish and emotional distress and he was injured thereby.

FOURTH CAUSE OF ACTION – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

33. The allegations contained in paragraphs 1 – 19, above, are repeated as if fully rewritten herein.

34. The mental anguish and emotional distress suffered by 3rd Plaintiff are serious or severe.

35. 3rd Plaintiff was injured by the actions of the Defendants as demonstrated below.

FIFTH CAUSE OF ACTION – PUNITIVE DAMAGES

36. The allegations contained in paragraphs 1 – 19, above, are repeated as if fully rewritten herein.

The actions of the Defendants were wanton, reckless and willful.

37. The Defendants published the article and posted the blog video with reckless disregard and indifference knowing that the statements contained in the publications were false and untrue before publishing it.

38. As specified below, the actions of the Defendants has caused tremendous injury to Plaintiffs.

SIXTH CAUSE OF ACTION- PRELIMINARY AND PERMANENT INJUNCTION

39. PLAINTIFF restates and re-avers each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.
36. Upon information and belief, some or all of the improper and unlawful conduct of all the DEFENDANTS alleged above is continuing and will continue in the future absent injunctive relief from the Court, and PLAINTIFFS will continue to be damaged by the same.
37. In the absence of the entry of a preliminary and permanent injunction by the court, PLAINTIFFS will suffer serious and irreparable harm and injury, including but not limited to damage of their respective reputations.
38. The entry of a preliminary and permanent injunction will not unduly harm or burden the DEFENDANTS.
39. Public policy favors the entry of a preliminary and permanent injunction because, inter alia, such relief will prevent unlawful conduct and will preserve and protect PLAINTIFFS respective reputation.

PRAYER FOR RELIEF

WHEREFORE, THE Plaintiffs, pray that this Court enters judgment in their favor and against the 1st, 2nd , 3rd and 4th Defendants as follows:

- A. An injunction and order permanently restraining the defendants from engaging in such unlawful conduct.
- B. An award of damages in excess of twenty million dollars (\$20,000,000.00) as against the 1st, 2nd, 3rd, and 4th Defendants to compensate the Plaintiffs for all monetary and economic harm, including irreparable damage to their reputation and standing.
- C. An award of damages in an amount to be determined at trial, as against the 1st, 2nd 3rd and 4th Defendants plus prejudgment interest, to compensate the Plaintiffs for all non-monetary or economic loss, and

compensation to the 2nd and 3rd Plaintiffs for mental anguish, emotional distress, depression and a myriad of health problems.

D. An award of punitive damages as against the 1st, 2nd, 3rd and 4th Defendants.

E. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiffs hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated this 10th day of October, 2017.

/s/ Ike Agwuegbo
Ike Agwuegbo & Co. P.C
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